

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

vs

JONATHAN GULDE

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CRIMINAL NO. 4:18-CR-713

**DEFENDANT JONATHAN GULDE’S MOTION FOR EARLY TERMINATION OF
PROBATION**

COMES NOW, Jonathan Gulde, by and through his attorney of record, A. Summer McKeivier and hereby moves this honorable Court for an order terminating his probation early. This request is based on the following:

1. Jonathan Gulde was indicted on December 13, 2018, along with his mother, Dr. Janis Fowler-Gulde, with conspiracy and distribution of controlled substances related to prescriptions issued by her. [Dkt. 1]
2. On November 12, 2019, Defendant entered a guilty plea to count 5 for aiding and abetting the unlawful distribution of controlled substances without a legitimate medical purpose and outside the scope of professional practice.
3. Mr. Gulde remained on bond without incident until he was sentenced on November 30, 2021, to three (3) years of probation and a \$10,000 fine. Defendant has now successfully completed nineteen (19) months of probation.
4. Mr. Gulde has satisfied all the financial obligations of his sentence.
5. According to United States Probation Officer Branden Rose, over the last year Mr. Gulde has successfully completed all mandatory drug testing, achieved stable community reintegration and is in compliance with all conditions of probation. Should he remain on

probation, Mr. Gulde's case would be transferred to the low threat caseload for the remaining probationary period.

6. Officer Rose has no objection to this request.
7. Assistant United States Attorney Devon Helfmeyer objects to this request.

WHEREFORE, PREMISES CONSIDERED, Defendant prays this Court issue an Order granting this motion and terminating his probation early.

Respectfully submitted,

/s/ A. Summer McKeivier
A. Summer McKeivier (24079949)
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **DEFENDANT JONATHAN GULDE'S MOTION FOR EARLY TERMINATION OF PROBATION** was delivered by electronic mail via the CM/ECF system to the following parties on June 28, 2023.

Devon Helfmeyer
DOJ Trial Attorney

Branden Rose
United States Probation

/s/ A. Summer McKeivier
A. Summer McKeivier

CERTIFICATE OF CONFERENCE

Counsel communicated via email with DOJ Trial Attorney, Devon Helfmeyer, between June 20th and 27th, 2023, at which time he expressed his opposition to this motion.

/s/ A. Summer McKeivier
A. Summer McKeivier